The Honorable Robert S. Lasnik 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 PATRIK GUSTAVSSON, No.: 2:20-mc-00111-RSL Northern District of Illinois Case No: 10 Non-Party, 1:19-cv-02170 (Consolidated) 11 v. REPLY IN SUPPORT OF PATRIK GUSTAVSSON'S MOTION TO 12 PLAINTIFFS IN IN RE: ETHIOPIAN AIRLINES FLIGHT ET 302 CRASH, **SEAL** 13 Note on Motion Calendar: December 14 18, 2020 15 16 17 18 19 20 21 22 23 24 25 26

1 REPLY 2 No party has filed any objection to Non-Party Patrik Gustavsson's Motion to Seal, which 3 is noted for consideration on December 18, 2020. A copy of the Motion to Seal was served on 4 December 8, 2020, and any objection to the Motion to Seal was due on December 16, 2020. 5 Pursuant to Local Court Rule 7(b)(2), "[e]xcept for motions for summary judgment, if a party fails 6 to file papers in opposition to a motion, such failure may be considered by the court as an admission 7 that the motion has merit." Accordingly, the Court should construe the lack of any opposition to 8 the Motion to Seal to an admission that the motion has merit and grant Mr. Gustavsson's Motion 9 to Seal for the reasons set forth in the motion. 10 11 Respectfully submitted. 12 DATED this 18th day of December, 2020. 13 14 15 16 17 18 19 20 21 22 23 24 25 26

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1 2 3 4 5 6 7 8	K&L GATES LLP By s/Michael D. McKay Michael D. McKay, wsba 7040 By s/Aaron E. Millstein Aaron E. Millstein, wsba #44135 By s/Benjamin C. Woodruff Benjamin C. Woodruff, wsba #56618 K&L Gates LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104 Telephone: (206) 623-7580 Fax: (206) 623-7022 Mike.McKay@klgates.com Aaron.Millstein@klgates.com Ben.Woodruff@klgates.com
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**DECLARATION OF SERVICE** 1 2 Benita G. Gould states and declares: 3 I am a citizen of the United States and of the State of Washington, living and residing in King County over the age of 21 years, not a party to the above-entitled action and 4 competent to be a witness. 5 2. On December 18, 2020, I served a true and correct copy of the forgoing document 6 by email to Plaintiff's counsel at the email addresses shown below: 7 Kevin P. Durkin 8 kpd@cliffordlaw.com 9 Tracy A. Brammeier TAB@cliffordlaw.com 10 Clifford Law Offices 11 120 North LaSalle Street, 31st Floor Chicago, IL 60602 12 Attorneys for Plaintiff 13 I declare under penalty of perjury under the laws of the State of Washington that the 14 foregoing is true and correct. 15 DATED this 18th day of December, 2020 at Seattle, Washington. 16 17 /s/ Benita G. Gould\_ Benita G. Gould, Sr. Practice Assistant 18 19 20 21 22 23 24 25 26